

1 Michele R. Stafford, Esq. (SBN 172509)
2 Adrian L. Canzoneri, Esq. (SBN 265168)
3 SALTZMAN & JOHNSON LAW CORPORATION
4 44 Montgomery Street, Suite 2110
5 San Francisco, CA 94104
6 (415) 882-7900
7 (415) 882-9287 – Facsimile
mstafford@sjlawcorp.com
erussell@sjlawcorp.com

8 Attorneys for Plaintiffs

9 Phil Hiroshima, Esq. (SBN 50758)
10 HIROSHIMA, LEWIS & DAGGETT
11 1420 River Park Drive, 2nd Floor
Sacramento, CA 95815
(916) 923-2223
(916) 929-7335
phiroshima@hdlaw.net

12 Attorney for Defendant

13
14 UNITED STATES DISTRICT COURT
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 BAY AREA PAINTERS AND TAPERS
PENSION TRUST FUND, et al.,

17 Plaintiffs,

18 v.

19 NEW WEST PARTITIONS, a California
Corporation,

20 Defendant.

21 Case No.: C14-04981 JSW

22
23
24
25
26
27
28 **JOINT REQUEST TO CONTINUE
CASE MANAGEMENT CONFERENCE;
[PROPOSED] ORDER THEREON**

Date: February 20, 2015

Time: 11:00 a.m.

Dept.: Courtroom 5, 2nd Floor,
Oakland, CA

Judge: Honorable Jeffrey S. White

1 Plaintiffs and Defendant, by and through their respective counsel of record, hereby
2 respectfully request that the Case Management Conference, currently scheduled for February 25,
3 2015, be continued for approximately sixty (60) days, or as soon thereafter as may be convenient
4 for the Court. Good cause exists for the requested continuance as follows:

5 1. As the Court's records will reflect, this action was filed by Plaintiffs on November
6 10, 2014 to compel Defendant's compliance with its obligations to pay monthly contributions to
7 Plaintiffs for hours worked by its employees, pursuant to its Collective Bargaining Agreement.

8 2. Defendants filed an Answer to the Complaint on December 22, 2014.

9 3. Counsel for both parties have been in communication throughout this matter and
10 have made progress towards resolution of the matter. Defendant has paid a small portion of the
11 amounts due to Plaintiffs and proposed a schedule for payment of the remaining amounts owed to
12 Plaintiffs.

13 4. The parties jointly request a continuance of the Case Management Conference to
14 allow the parties to resolve this matter without the need for further litigation.

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 //

27 //

28 //

-2-

**JOINT REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER
CASE NO.: C14-04981 JSW**

1 5. There are no issues that need to be addressed by the parties at the currently scheduled
2 Case Management Conference. In the interest of conserving costs, as well as the Court's time and
3 resources, Plaintiffs and Defendant jointly and respectfully request that the Case Management
4 Conference, currently scheduled for February 20, 2015, be continued for approximately sixty (60)
5 days, to allow sufficient time for the parties to continue their attempts to resolve this matter outside
6 of litigation.

7

8 Date: February 10, 2015

SALTZMAN & JOHNSON
LAW CORPORATION

9

10

By: _____ /S/
11 Michele R. Stafford
Attorney for Plaintiffs

12

13

Date: February 10, 2015

HIROSHIMA, LEWIS & DAGGETT

14

15

By: _____ /S/
Phil Hiroshima
16 Attorney for Defendant

17

IT IS SO ORDERED.

18 Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case Management
Conference is hereby continued to April 24, 2015 at 11:00 a.m.. All related deadlines are extended
19 accordingly. The parties' joint case management statement shall be due by April 17, 2015.

20

21

Date: February 11, 2015



UNITED STATES DISTRICT JUDGE

22

23

24

25

26

27

28